

**REMARKS**

Claims 1-21, 31-40, 50, and 53-57 are pending in this application. In light of the remarks contained herein, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections.

In the outstanding Official Action, the Examiner rejected claims 1, 4-12, 14-21, 31-32, 37-40, 50, and 53-57 under 35 U.S.C. § 103(a) as being unpatentable over *Hecht* (USP 6,594,406) in view of *Silver et al.* (USP 6,658,145); rejected claims 2 and 33 under 35 U.S.C. § 103(a) as being unpatentable over *Hecht* and *Silver*, and further in view of *Shiigi* (USP 6,304,898); and rejected claims 3, 13, and 34-36 under 35 U.S.C. § 103(a) as being unpatentable over *Hecht* and *Silver*, and further in view of *Morgan* (USP 5,428,805). Applicants respectfully traverse these rejections.

**Claim Rejections - 35 U.S.C. § 103 - *Hecht/Silver***

In support of the Examiner's rejection of claim 1, the Examiner admits that *Hecht* fails to teach or suggest wherein the total set of positions coded by the position-coding pattern specifies unique positions on an area greater than any practically useable base. To cure the deficiencies of the teachings of *Hecht*, the Examiner asserts *Silver* teaches an area of the total set of positions having n dimensions, citing to col. 2, line 66 - col. 3, line 1 and col. 3, lines 9-11. The Examiner further asserts that this total set of positions "can be affixed to 2-dimensional correlation, which are practically useable base," citing to col. 3, lines 4-7 and lines 15-18. Applicants respectfully disagree with the Examiner's characterization of this reference.

The disclosure of *Silver* is directed to fast high-accuracy multi-dimensional pattern inspection. The method and apparatus of *Silver* provide for identifying differences between a stored pattern and a matching image subset, where variations in pattern position, orientation, and size do not give rise to false differences. Specifically,

at col. 2, line 64 - col. 3, line 1, *Silver* discloses that stored patterns may be rotated and/or scaled by digital image resampling methods before being matched against the image. By matching over a range of angles, sizes, and x-y positions, one can locate an object in the corresponding multi-dimensional space. In col. 3, lines 9-11 *Silver* further discloses the search methods including two or more phases where the earliest phase uses a coarse, subsampled version of the pattern to cover the entire search space quickly and identify possible object locations in the n dimensional space.

In contrast, the present invention as set forth in claim 1 recites, *inter alia*, a global information management system, comprising a position-coding pattern wherein the total set of positions coded by the position-coding pattern specifies unique positions on an area greater than any practically useable base. However, *Silver* teaches multi-dimensional space being made up of different matching parameters between the image and the pattern. There is no teaching or suggestion that is directed to the position-coding pattern wherein the total set of positions coded by the position-coding pattern specifies unique positions on an area greater than any practically useable base. As *Silver* fails to cure the deficiencies of the teachings of *Hecht*, Applicants respectfully submit that neither of the references, either alone or in combination, teach or suggest all of the claim elements. As such, the Examiner has failed to establish *prima facie* obviousness under 35 U.S.C. § 103. It is respectfully requested that the outstanding rejection be withdrawn.

It is respectfully submitted that claims 2-11 and 55 are allowable for the reasons set forth above with regard to claim 1 at least based upon their dependency on claim 1. It is further respectfully submitted that claims 12, 31, 37, 50, and 53 include elements similar to those discussed above with regard to claim 1, and thus these claims, together with claims dependent thereon, are allowable for the reasons set forth above with regard to claim 1.

**Additional Comments**

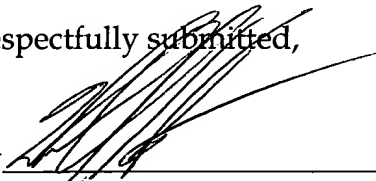
This Reply is being filed concurrently with a Request for Interview. Applicants respectfully request the Applicants contact the undersigned to schedule an interview prior to formally considering these arguments on the record.

**Conclusion**

If the Examiner has any questions concerning this application, the Examiner is requested to contact Catherine M. Voisinet, Reg. No. 52,327 at the telephone number of (703) 205-8000. Facsimile communications may be sent to facsimile number (703) 205-8050.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

By 

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